

BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF HAWAII

In the Matter of the Application of )

PUBLIC UTILITIES COMMISSION )

Instituting a Proceeding to Investigate the )  
Implementation of Feed-in Tariffs. )  
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DOCKET NO. 2008-0273

PUBLIC UTILITIES  
COMMISSION

2009 JAN 28 P 3:16

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**HAWAII SOLAR ENERGY ASSOCIATION'S  
INFORMATION REQUESTS TO HAWAIIAN ELECTRIC COMPANY AND  
THE CONSUMER ADVOCATE REGARDING THEIR  
JOINT PROPOSAL ON FEED-IN TARIFFS**

**AND**

**CERTIFICATE OF SERVICE**

MARK DUDA  
PRESIDENT  
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BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF HAWAII

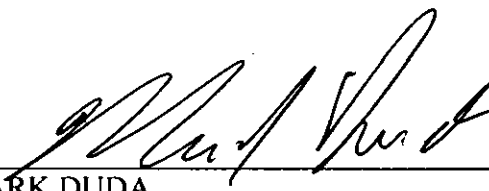
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Pursuant to the Commission's Order Approving the HECO Companies' Proposed Procedural Order, as Modified, filed on January 20, 2009, Hawaii Solar Energy Association (HSEA) hereby submits the following Information Requests to the HECO Companies and the Division of Consumer Advocacy.

Respectfully submitted.

DATED: Honolulu, Hawaii, January 28, 2009.

  
\_\_\_\_\_  
MARK DUDA  
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PO Box 37070  
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**INSTRUCTIONS:**

In order to expedite and facilitate HSEA's ("HSEA") review and analysis in the above matter, the following is requested:

1. For each response, the HECO Companies and the Consumer Advocate ("HECO/CA") should identify the person who is responsible for preparing the response as well as the witness who will be responsible for sponsoring the response should there be an evidentiary hearing;
2. Should HECO/CA claim that any information is not discoverable for any reason:
  - a. State all claimed privileges and objections to disclosure;
  - b. State all facts and reasons supporting each claimed privilege and objection;
  - c. State under what conditions HECO/CA is willing to permit disclosure to HSEA (e.g. protective agreement, review at business offices, etc.); and
  - d. If HECO/CA claims that a written document or electronic file is not discoverable, besides complying with subparagraphs 2a-c, identify each document or electronic file, or portions thereof, that HECO/CA claims are privileged or will not be disclosed, including the title or subject matter, the date, the author(s) and the addressee(s).

#### HSEA IR#1

HSEA believes that customer-generators should be offered the option of net energy metering for energy produced up to the amount of their annual usage. This approach differentiates customer-generators (who are in the business of offsetting their annual load) from entities in the business of producing power for profit, even at similar scales of operation. Please explain the rationale behind treating customer-generators and entities producing power for sale the same way under a feed-in tariff and how this serves the public interest?

#### HSEA IR#2

HECO/CA seem to have indicated a preference for a feed-in tariff rate below the cost of grid power. Yet, the explicit motivation for the feed-in tariff is to *accelerate* the penetration of renewables. Do HECO/CA have evidence that projects using the technologies envisioned for a feed-in tariff are financially viable at per kWh rates below, or even at, the current retail rate? If not, what is being done to ensure that the feed-in tariff is accelerating penetration of renewables?

#### HSEA IR#3

Although the HECO companies have expressed a preference for siting storage at utility facilities, this issue seems not to have been definitively addressed. Therefore, please provide any information about differential rates that could become available for various technologies with associated storage, versus the same technology without storage.

#### HSEA IR#4

The HECO companies have made note of a number of impediments to interconnecting DG sources above various thresholds such as 10% or 15% at the feeder circuit level. (As an example, at the unofficial technical working group meeting, a representative of the Companies referred to concerns about inverter voltage tripping due to fluctuations in grid frequency.) To the extent possible, please provide a comprehensive list of the Companies' perceived impediments to increasing levels of DG penetration under a feed-in tariff.

#### HSEA IR#5

The various intermittent technologies under consideration for feed-in tariffs have different intra-day generation profiles, which relate differently to the utility's load curve. To what extent is this a consideration in developing pricing and penetration levels for various technologies?

CERTIFICATE OF SERVICE

The foregoing Information Request to Hawaiian Electric Company and the Consumer Advocate regarding their Joint Proposal on Feed-in Tariffs was served on the date of filing by hand delivery or electronically transmitted to the following Parties:

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2 Copies  
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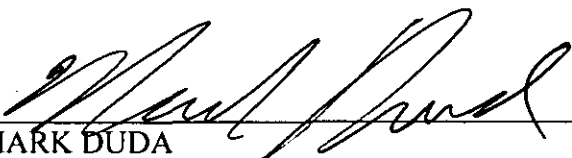
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DATED: Honolulu, Hawaii, January 28, 2009.

  
MARK DUDA

Hawaii Solar Energy Association